HALLIBURTON NUS
Environmental Corporation

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C-49-04-92-59

April 6, 1992

Northern Division
Naval Facilities Engineering Command
U.S. Naval Base, Building 77-L
Philadelphia, Pennsylvania 19112-5094

Attention: Ms. Debra Felton (Code 1421/DF)
Remedial Project Manager

Reference: Contract No. N62472-90-D-1298, CTO No. 0002

Subject: Response to Comments on the Draft Site Investigation Report and PA Scoring.
NWIRP, Calverton, New York

Dear Ms. Felton:

Please find attached the responses to the comments dated March 10, 1992 for the subject reports. These responses are as per our discussions through March 27, 1992.

If you have any questions or require additional information, please call me at (412) 921-8375.

Very truly yours,

David D. Brayack

David D. Brayack, P.E.
Project Manager

/DDB

cc: Mr. R. Boucher (Navy) w/o attachment
Mr. D. Rule (Navy) w/o attachment
Mr. J. Trepanowski (HNUS)
Ms. D. Wroblewski (HNUS)
Ms. P. Patton (HNUS) w/o attachment

New York Department of Environmental Conservation Comments - dated March 4, 1992

1. COMMENT: There are a number of statements in the report which are not provided with supporting documentation leading to the conclusion.

   Example: Hazardous waste was collected and sludge was pumped during the operation. It should be stated whether this practice was followed all the time or not and give the reference document to support this.

   RESPONSE: Additional detail is required to address this comment. Please forward examples. The example cited was not found in the SI report.

2. COMMENT: Domestic sewage system was installed in early 70's. Several leaching fields were in use prior to that. There is no mention about the old leaching pool system. Make a statement regarding abandoned leaching facilities if present.

   RESPONSE: There is the potential that several abandoned leach field are present at the NWIRP, Calverton. Up until this time, leach fields at the NWIRP have not been identified as potential source areas of contamination. During the upcoming Remedial Investigation scoping, several stage of the Initial Assessment Study (IAS) will be repeated to determine if there are additional leach fields present and whether there was the potential for industrial chemicals to be present.

3. COMMENT: Did the consultant collect sludge samples from the existing leaching pool? If not, sludge samples should be collected for chemical analysis.

   RESPONSE: No samples were collected from the actual leach fields because they were not identified as potential source areas of chemical contamination. During the upcoming Remedial Investigation scoping, several stage of the Initial Assessment Study (IAS) will be repeated to determine if there are additional leach fields present and whether there was the potential for industrial chemicals to be present.

4. COMMENT: Investigation of the old leach field, as recommended by the consultant, should be considered. It is reported by SCDHS that up to 120 ppm of 1,1,1-trichloroethane were detected during the early 1980's in a SCDHS monitoring well located downgradient of the leach field (S-51591, N/S Swan Pond Road, 318', W/O River Road).

RESPONSE: This leach field will be investigated in an upcoming RI.

5. COMMENT: Chemical analysis of the sludge from the treatment plant should be done.

RESPONSE: The treatment plant is covered under an existing NPDES permit. As a result, evaluation of this sludge is beyond the allowable scope under the IRP program.

6. COMMENT: The old facilities plans should be reviewed to identify all abandoned above and below ground tanks, pipelines, and subsurface disposal pools.

RESPONSE: The IAS was used as a basis for identifying potential source areas. A copy of the IAS will be included with the submission of final report.

7. COMMENT: Review old aerial photos to identify additional possible disposal sites throughout the entire facility.

RESPONSE: The IAS was used as a basis for identifying potential source areas. A copy of the IAS will be included with the submission of final report.

8. COMMENT: Review past chemical usage to identify all potential chemicals of concern.

RESPONSE: The IAS was used as a basis for identifying potential source areas. A copy of the IAS will be included with the submission of final report.

9. COMMENT: Review past disposal practices including on-site discharges, transport to the Bethpage facility, and transport to the Riverhead Landfill.

RESPONSE: The IAS was used as a basis for identifying potential source areas. A copy of the IAS will be included with the submission of final report.

10. COMMENT: Investigation of former coal storage area which is also upgradient of S-51591, as recommended by the consultant, should be considered.

RESPONSE: This former coal storage area will be investigated during an upcoming RI.

11. COMMENT: Investigation of McKay Lake including bottom sediment and fish tissue analyses for the full range of possible contaminants and chemical analysis of the sludge from the treatment plants should be considered.

RESPONSE: McKay Lake is an active NPDES permitted facility. As a result, evaluation of this lake is beyond the allowable scope under the IRP program.

12. COMMENT: On page 1-2 it is stated that most significant contaminants detected in the soils at site 6A include 1,1,1-trichloroethane (7,400 J ppb) and in groundwater chloroethane 2600 ppb, 1,1 dichloroethane 300 ppb and 1,1,1 trichloroethane 23 ppb. Section 2 does [not] discuss the possible sources for this contamination.

RESPONSE: The sources of these contaminants is basically unknown. During an upcoming RI, potential sources of this contamination will be investigated, including the old leach field bed.

13. COMMENT: Page 1-3 (line No. 3) 1,1 dichloroethane 300 mg/l, instead of ug/kg.

RESPONSE: The correct units of "ug/l" will be incorporated into the final report.

14. COMMENT: The Section 1 should clearly state the objective of this site investigation.

RESPONSE: A new section will be inserted into Section 1.0. The section will be as follows.

1.2 Purpose

The objective of the SI is to obtain environmental information in order to:

- Eliminate from further investigation those sites that pose no definable threat to the environment or to public health under CERCLA.
- Collect data to develop a valid PA score for the sites.
- Document the release or potential release of hazardous substances at each site and determine if additional action is required.

15. COMMENT: Page 2-8 states that an open field, approximately 10 acres in area is part of site 6A. Indicate this in the figure as a shaded area.

RESPONSE: Figure 2-4 will be revised to include the field south of the fuel calibration area.

16. COMMENT: On-site groundwater is contaminated. To identify potential downgradient impacts, the direction of groundwater flow on-site must be determined. Based on the well logs for the monitoring wells already on-site, a contour map of groundwater flow should be constructed and groundwater flow direction should be shown for all the area investigated.

RESPONSE: The groundwater flow direction was not identified during the SI. According to the IAS, the groundwater flow direction at Sites 1, 6A, 6B, and 6C is to the south by south-west, and at Sites 2 and 4 is to the south by south-east. The flow direction at Site 7 was not identified in the IAS.

17. COMMENT: The report should indicate whether the free product is continuous or discrete between sites 2, 6A and 7.

RESPONSE: Based on the relative distance between the sites and the lack of free product in several wells at each site, it is likely that the free product plume is not continuous. However, there is insufficient information at this time to conclude that in the SI. Rather, during the upcoming RI, this issue can be addressed.

18. COMMENT: The report should discuss details regarding the groundwater recovery unit currently operating in Site 2. Specifically, the report should indicate how much free product this system is capturing, what the cone of influence for the treatment system is, how much free product is on-site, and how long the system is to operate.

RESPONSE: The available information on the groundwater recovery unit at Site 2 is discussed in Appendix C.

19. COMMENT: The ammunition demolition area (Figure 2-3) should be investigated as a source of lead, dinitrotoluene and trinitrotoluene contamination. At the very least, a description of the amount and type of ammunities disposed in this area is needed. Another potential source of contamination at the site that needs to be addressed is the drum storage area located on the map given on page 2-11.

RESPONSE: Based on the findings of the IAS (to be provided with the final report), no additional investigation is required in at ammunition demolition area. The drum storage area referenced is currently active and therefore not addressed under the IRP program.

20. COMMENT: The top paragraph of page 3-2 of the report states the "country" samples private wells. This probably should read the "county" sampled the private wells.

RESPONSE: This typo will be corrected.

21. COMMENT: The bulleted items on Page 11-2 contradict each other. The third item indicated no HNU readings above background were detected while the first item indicates HNU readings above background were detected. The discrepancy needs to be explained.

RESPONSE: The third bulleted item will be revised as follows:

"• No HNU readings above background level were obtained in the monitoring wells."

22. COMMENT: The report should indicate the source of freon 113 found in water samples from the on-site production wells (see page 12-1).

RESPONSE: The source of the freon 113 found in some of the water samples is unknown.

23. COMMENT: The data in Table 12-1 does not agree with the data in the table given on page 12-1. For example, the table on Page 12-1 indicates the maximum concentration of 1,1,1-trichloroethane found was 3 micrograms per liter while in Table 12-1 it is stated at 5.0 micrograms per liter. Other data presented also does not agree.

RESPONSE: The data presented on page 12-1 and in Table 12-1 are completely separate sample conditions. The data on page 12-1 is historic data (March/April 1991), whereas the data in Table 12-1 is from the SI field activities (July 1991). This data should not be compared directly.

24. COMMENT: The list of recommendations given on Page 1-3 should be expanded to include the need for the various additional investigations suggested in the above referenced comments as well as the recommendations proposed by the consultant throughout the report.

RESPONSE: The following recommendations will be added to Page 1-3.

- Additional investigation should be conducted to evaluate other potential source areas of contamination, including abandoned leach fields throughout the NWIRP.

Also, a specific reference will be added concerning the former coal pile.

25. COMMENT: The report discusses the free product found in the monitoring well for fuel calibration area (site 6A), but it goes not clearly state what the free product is based on the chemical analysis.

RESPONSE: The chemical testing conducted was not intended to determine the source of the free product or the exact identity. As a result, additional conclusions cannot be stated. More specific characterization including the nature and extent of the free product contamination will be part of the RI scope.

Grumman Aerospace Corporation Comments

HNUS RESPONSES

26. COMMENT: Highlighted phrases on page 1-2 and 1-3 are poorly written, are subject to misinterpretation, and may cause public to be alarmed. A better way to present the same data would be to say that (compound name) was detected in (medial value) concentration (or range of concentration).

RESPONSE: As directed by the Navy, no changes will be made as a result of this comment. This section is an introduction and the use of the term "contaminant" is appropriate in this section.

27. COMMENT: No details are provided and there is no mention of regulatory involvement/acceptance of actions taken. Reference should be made to Appendix B where these details are described.

RESPONSE: Regulatory involvement is provided in Section 2.5 - Regulatory Action History. A reference to Appendix A and B will be provided at the beginning of Section 2.6.

28. COMMENT: Site specific data should be used to define ranges for background values. If cannot use site specific data use data from another site in vicinity (i.e., Brookhaven Nat. Labs). In addition, background ranges can be obtained from USGS Professional Paper No. 1270.

RESPONSE: The USGS paper was reviewed. The data collected from the study at NWIRP Bethpage was determined to be more appropriate because of the proximity of the sites and the similar geography. Site specific background samples will be collected during the RI.

29. COMMENT: This is a general comment for Sections 6 through 13. The highlighted terminology is consistently used throughout these sections without reference to concentrations found or comparison to standards. It would be better to say the compounds were detected and refer to Table for comparison to standards and values found.

RESPONSE: The chemical results discussed in Sections 6 through 13 have been subjected to preliminary screening as discussed in Section 5.0. Therefore, all results presented are indications of potentially significant contamination. Section 15 (to be deleted) currently discusses the relative significance of contamination to standards and other values.

30. COMMENT: Similar letters (p 2-17, fourth paragraph) were also received on 9/16/87 for fuel calibration area (see Attachment 1) and on 3/14/89 for the fuel depot area (see Attachment 2).

RESPONSE: Reference to these letters will be provided in the text.

31. COMMENT: Page 2-18, fuel depot remedial activities were limited to the identification of the "dissolved" product plume.

RESPONSE: The report will be modified as indicated.

32. COMMENT: Add Grumman Wells for Plant 8 and Plant 78. Also, these should be considered as private wells.

RESPONSE: The data on these wells will be collected incorporated into the report as suggested.

33. COMMENT: Page 3-2, Well No. 2 was removed from service on "12/15/89" and Well No. 3 was removed from service "4/23/91"

RESPONSE: The report will be modified as indicated.

34. COMMENT: Page 13-1, Where is the supporting data for the discussion of the MS/MSD discussion at the bottom of the page.

RESPONSE: The data validation letters in Appendix L will be referenced at this point.

35. COMMENT: Page 14-1, editorial changes

RESPONSE: Changes will be made as indicated.

36. COMMENT: Page 15-1, insert

RESPONSE: Section 15 will be deleted.

37. COMMENT: PA Score Sheet, editorial changes

RESPONSE: The changes to the text will be made as indicated. However, the changes cannot be made to the computer spread sheet since aircraft cleaning is not on the reference list for this section.

NEHC Comments - Dated January 22, 1992

HNUS RESPONSE

38. COMMENT: Page 2-1, Section 2.1, paragraph 1. This is the first of many instances where the text cites the reference "USGS 1987". The list of references provided at the end of the document does not have a USGS, 1987 listing but rather a USGS, 1967 listing.

RESPONSE: This typo will be corrected.

39. COMMENT: Page 2-5, Section 2.2.5. The text states that the area southwest of the runup area "has been excavated to a depth of up to 6 feet." The purpose of the excavation is not stated. Was the area excavated as part of a remedial action? If so, was sampling conducted before and after the excavation to determine contamination levels?

RESPONSE: The reason for the excavation is not known. However, because of the proximity of the soil boring to the end of the runway, the fill identified was likely used to level out the runway area.

40. COMMENT: Page 2-18, Section 2.6. The text states that by November 1987, a total of 18 monitoring wells were installed in the fire training area by MPC. This disagrees with an earlier paragraph written in the text (Section 2.4.2.2).

RESPONSE: A total of 18 wells is the correct number. Only 6 additional wells were installed in November 1987, not 16 presented in the text.